

CORRES. CONTROL
INCOMING LTR NO.

03831 RF 94

States Government

Department of Energy

Rocky Flats Field Office

DUE
DATE

Memorandum

OCT 7 3 30 AM '94

ACTION

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DAVIS, J.G.		
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FRAY, R.E.		
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GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.		
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KUESTER, A.W.		
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McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
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SANDLIN, N.B.		
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SEP 04 1994

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE SECTION

ER:SRG:10333

Operable Unit No. 2 Subsurface IM/IRA Post Pilot Operation versus Six Phase Heating

Wanda Busby, Manager
Operable Unit 2 Closure
EG&G Rocky Flats, Inc.

This is in response to your letter dated September 26, 1994, (94-RF-0926; WSB-096-94) concerning the Operable Unit 2 (OU2; 903 Pad, Mound, and East Trenches) Subsurface Interim Measure/Interim Remedial Action (IM/IRA). Specifically, you have proposed discontinuance of "post-pilot" operations at the IM/IRA test site 1. The basis of the proposal was cost and the rate of contaminant removal. This letter is pretty much the same as your June 24, 1994, letter (94-RF-06845/GRK-020-94). My response to the June 24 letter is still valid (ER:SRG:07120). If there is a replacement activity for post-pilot operations, such as an accelerated test site 3 at the Mound or earlier initiation of the Six Phase Heating Project at test site 2, then we would be willing to propose discontinuation of post-pilot activities at test site 1. However, this is not the case.

Your discussions on cost appear biased. I point out that the estimate of \$342 per pound of VOCs removed (this differs from your June cost estimate of \$1,900 per pound) is based upon only two extraction wells. This cost per pound could be significantly reduced if additional extraction wells were installed. Although it may make fiscal sense to discontinue post-pilot operations if we are going to remediate the whole site using Six Phase Heating, it is my understanding that the option of one array or several arrays is being reevaluated. Until such time that we can present a defensible case to the Environmental Protection Agency and the Colorado Department of Public Health and Environment, we must continue post-pilot operations at test site 1.

Until it is decided what the scope of the IM/IRA project will be, and the project properly scoped, costed, and scheduled, further discussion of discontinuation of post-pilot operations is premature. It is imperative that this project be scoped as soon as possible. If indecision continues, there is great potential to affect current enforceable schedules. As discussed on October 3, 1994, we suggest conducting a senior level review of the project, including how it ties to the feasibility study.

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ADMN RECORD/080 X 2
PATS/T130G

Reviewed for Addressee
Corres. Control RFP

10-7-94 JAO
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

Scott R. Grace

Scott R. Grace
Operable Unit 2 Manager
ER MSA Projects Division

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94-DOE-10333

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cc :

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